

REPORT OF REQUEST FOR RESTRICTIVE TRADE PRACTICE OR BOYCOTT  
SINGLE TRANSACTION

(For reporting requests described in Part 769 of the Export Administration Regulations)

## NOTICE OF RIGHT TO PROTECT CERTAIN INFORMATION FROM DISCLOSURE

The Export Administration Act permits you to protect from public disclosure information regarding the quantity, description, and value of commodities or technical data supplied in Item 11 of this report and in any accompanying documents. If you do not claim this protection, all of the information in your report and in accompanying documents will be made available for public inspection and copying.

You can obtain this protection by certifying, in Item 10 of the report, that disclosure of the information referred to above would place a United States company or individual involved in the report at a competitive disadvantage. If you make such a certification in Item 10, you may remove information regarding the quantity, description, and value of the commodities or technical data supplied by you from Item 11 of the inspection copy of the report form and from the public inspection copies of the accompanying documents.

The withholding of this information will be honored by the Department unless the Secretary determines that disclosure of the information would not place a United States company or individual at a competitive disadvantage or that it would be contrary to the national interest to withhold the information.

A		BATCH		5	
1		6		9	
MONTH/YEAR		10		15	
RSN		SUBSET		16 17	
RTP		18		27	
CLASS		FILING		TAG	
28		55		70 80	

This report required by law (50 U.S.C. App. §2407 (b) (2) P.L. 96-72; E.O. 12214; 15 C.F.R. Part (769)). Failure to report can result both in criminal penalties, including fines or imprisonment, and administrative sanctions.

**Instructions:** 1. Complete all items that apply. 2. Assemble original report form and accompanying documents as a unit, and submit intact and unaltered. 3. Assemble and submit the duplicate copy of report form (marked Duplicate (Public Inspection Copy)) and additional copies of accompanying documents (marked with the legend "Public Inspection Copy.") 4. If you certify, in Item 10, that the disclosure of the information specified there would cause competitive disadvantage, edit the "Public Inspection Copy" of the documents submitted to exclude the specified information and remove the bottom of the Duplicate "Public Inspection Copy" of the report form relating to Item 11.

Public reporting for this collection of information is estimated to average one hour per request, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Office of Security and Management Support, Bureau of Export Administration, U.S. Department of Commerce, Washington, D.C. 20230; and to the Office of Management and Budget, Paperwork Reduction Project (0694-0012), Washington, D.C. 20503

1a. Identify firm submitting this report: Name: <u>REVERE COPPER PRODUCTS INC</u> Address: <u>24 N. FRONT ST</u> City, State and ZIP: <u>NEW BEDFORD MA 02740</u> Country (If other than USA): Telephone: <u>(508) 999-5601</u> Firm Identification No. (If Known): <u>29-34 28702</u>		Specify firm type: <input checked="" type="checkbox"/> Exporter <input type="checkbox"/> Bank <input type="checkbox"/> Forwarder <input type="checkbox"/> Carrier <input type="checkbox"/> Insurer <input type="checkbox"/> Other 35	1b. Check any applicable box: <input type="checkbox"/> Revision of a previous report (attach two copies of the previously submitted report) <input type="checkbox"/> Resubmission of a deficient report returned by BXA (attach form letter that was returned with deficient report) <input type="checkbox"/> Report on behalf of the person identified in Item 2 <input type="checkbox"/> Dual report on behalf of self and the person identified in Item 2
2. If you are authorized to report and are reporting on behalf of another U.S. person, identify that person (e.g., domestic subsidiary, controlled Foreign subsidiary, exporter, beneficiary): Name: Address: City, State and ZIP: Country (if other than USA): Type of firm: (see list in Item 1a) Firm Identification No. (if known):		3. Identify exporting firm, unless same as Item 1a or 2: Name: Address: City, State and ZIP: Country (if other than USA): Firm Identification No. (if known): 36-41 42	
4. (a) Name of boycotting country from which request originated: <u>ABU DHABI, U.A.E.</u> (b) Name of country directing inclusion of request, if different from (a) above: <u>ITALY</u> 43-44		5. Name of country or countries against which request is directed: <u>ISRAEL</u> 45-46	
6. Reporting firm's reference number (e.g., letter of credit, customer order, invoice): 71-77		7. Date firm received request: (use digits for month/day/year) <u>10/12/98</u> 47-52	
8. Specify type(s) of document conveying the request: <input type="checkbox"/> Request to carrier for blacklist certificate (submit two copies of blacklist certificate or transcript of request) <input type="checkbox"/> Unwritten, not otherwise provided for (make transcript of request and submit copies) 53-54		<input type="checkbox"/> Letter of credit <input type="checkbox"/> Requisition/purchase order/accepted contract/shipping instruction <input type="checkbox"/> Bid invitation/tender/proposal/trade opportunity <input type="checkbox"/> Questionnaire (not related to a particular dollar value transaction) <input checked="" type="checkbox"/> Other written (specify) <u>MANUFACTURER DECLARATION</u> Submit two copies of each document or relevant page in which the request appears	
9. Decision on request: (Check one) <input type="checkbox"/> Have not taken and will not take the action requested. <input type="checkbox"/> Have taken or will take the action requested. <input type="checkbox"/> Have taken or will take the action requested and claim it is subject to a grace period (attached detailed explanation). 56-57		<input checked="" type="checkbox"/> Have taken or will take the action requested but in a modified form (attach detailed explanation). <input type="checkbox"/> Unable to report ultimate decision on the request at this time and will inform the Bureau of Export Administration of the decision within ten days after decision is made. <u>PD 01-2099</u>	
Additional Information: The firm submitting this report may, if it so desires, state on a separate sheet any additional information relating to the request reported or the response to that request. This statement will constitute a part of the report and will be made available for public inspection and copying, subject to the right to protect certain confidential information from disclosure described in Item 10.			
10. Protection of Certain Information from Disclosure: (Check appropriate boxes and sign below) 1. <input checked="" type="checkbox"/> I (We) certify that disclosure to the public of the information regarding quantity, description, and value of the commodities or technical data contained in: <input checked="" type="checkbox"/> Item 11 below (If you check this box, be sure to remove the bottom of the Duplicate (Public Inspection Copy) of the report form relating to Item 11.) <input type="checkbox"/> Attached documents (If you check this box, be sure to edit the "Public Inspection Copy" of the documents submitted to exclude the specified information.) would place a United States person involved at a competitive disadvantage, and I (We) request that it be kept confidential. 2. <input type="checkbox"/> I (we) authorize public release of all information contained in the report and in any attached documents. I (We) certify that all statements and information contained in this report are true and correct to the best of my (our) knowledge and belief.			
Sign here in ink <u>Thomas G O'Shaughnessy</u>		Type or print <u>THOMAS G O'SHAUGHNESSY</u> Date <u>1/19/99</u>	

REVERE COPPER PRODUCTS, INC.

Attachment to Dept. Of Commerce Form BXA-621P

Question 9:

Revere Copper Products, Inc. (The "Company") received an order from Fisia Italimpianti of Genoa, Italy to supply copper nickel plate for use in a desalination project in Abu Dhabi.

The Company received from its Italian customer a Manufacturer Declaration (attachment A-1) asking the Company to certify, among other things, that the goods were not produced in Israel, by Israeli citizens, or by a company organized under the laws of Israel. A non-managerial employee of the Company determined that the certifications requested were accurate and proceeded to sign the Manufacturer Declaration on behalf of the Company and forward it to the customer as requested. Later Management personnel of the Company learned of the Manufacturer Declaration and, after consultation with legal counsel, notified the customer that the Manufacturer Declaration previously furnished was unauthorized and should be disregarded (attachment A-2).

Also attached is the modified Manufacturer Declaration as submitted by the Company after review by legal counsel (attachment A-3).

A-1

MANUFACTURER DECLARATION

STATEMENT

In connection with the performance of the Purchase Order No. .... Dated.....

WE DECLARE

that the goods under shipment with Packing List No..... do not contain any products or components :

- a) originating in Israel
- b) manufactured, produced or furnished by companies organized under the law of Israel
- c) manufactured, produced or furnished by nationals or residents of Israel

SIGNATURE

.....

No. 3 Originals on Company headed letter

A-2  
**Revere Copper Products, Inc.**  
**U.S.A.**



TELEFAX MESSAGE  
FAX (508) 990-2954  
NUMBER OF PAGES  
INCLUDING THIS PAGE 1



DATE: JANUARY 4, 1999

TO: A. BALBONI  
EBERTRADE  
FAX 39-2-7000-3970

REF: FISIA ITALIMPIANTI - RUWAIS - MANUFACTURER DECLARATION  
=====

ALESSANDRO,

JOHN BROWN IN ADVERTENTLY SIGNED AND SUBMITTED THE MANUFACTURING DECLARATION DOCUMENT REQUESTED BY FISIA ITALIMPIANTI AS PART OF THE INVOICING/SHIPPING DOCUMENTS. THIS DOCUMENT WAS ATTACHED TO THE FIRST TWO INVOICES AND TO THE FIRST TWO CONTAINERS. (FOUR DOCUMENTS IN TOTAL) PLEASE HAVE FISIA (AND DEUTSCHE BABCOCK) DISREGARD THESE PARTICULAR DOCUMENTS AS THEY WERE NOT EDITED, CLEARED OR AUTHORIZED THROUGH OUR NORMAL REVERE CHANNELS.

BEST REGARDS,

THOMAS G. O'SHAUGHNESSY

CC: MR. L. J. HOWIE, DEUTSCHE BABCOCK 9712 553321  
MR. ROBIN ROGERS, ADOS 9712 787678

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**Revere Copper Products, Inc.**  
**U.S.A.**



**MANUFACTURER'S DECLARATION**

Subject: Ruwais Refinery Expansion Project No. 1214  
General Utilities Plant (GUP) Expansion  
Fisia Italimpianti  
Purchase Order No. 98063200/MF-MPO 2015

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We declare that:

In connection with the performance of this subcontract, we acknowledge all material is completely manufactured and produced in the United States of America.

Packing List No. \_\_\_\_\_

Sincerely yours,

John C. Brown  
International Sales

Revised January 18, 1999